

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)	
)	
v.)	
)	
JOSEPH CARAMADRE)	Criminal No. 11-186-S
)	
and)	
)	
RAYMOUR RADHAKRISHNAN)	
)	
Defendants)	

DEFENDANT JOSEPH CARAMADRE'S MOTION FOR
LEAVE TO FILE REPLY MEMORANDUM

Defendant Joseph Caramadre hereby moves this Honorable Court pursuant to Local Rule Criminal 47(b)(2) for leave to file the attached Reply Memorandum of Law in support of his Motion For Leave to Waive Jury Trial. On July 16, the government filed a Response Memorandum in opposition to Defendant's Motion. The government's Reply Memorandum mischaracterizes the issues before the Court and raises issues which require a brief response.

For the foregoing reasons, the defendant requests leave to submit the attached Reply Memorandum to address these matters.

Respectfully submitted,
JOSEPH CARAMADRE
By and through his Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2012, a copy of the foregoing Defendant Joseph Caramadre's Motion for leave to file a Reply Memorandum was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Anthony M. Traini
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